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Attorneys for Plaintiffs
EQUALIA, LLC and HOVERBOARD
TECHNOLOGIES CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EQUALIA, LLC, a California limited
liability company, and HOVERBOARD
TECHNOLOGIES CORPORATION, a
California corporation,

Plaintiffs,

v.

KUSHGO LLC dba HALO BOARD, a
California limited liability company;
HALO BOARD LLC, an Oregon limited
liability company; ARTHUR
ANDREASYAN, an individual; and
SHENZHEN WINDGOO INTELLIGENT
TECHNOLOGY CO. LTD., a foreign
company,

Defendants.

CASE NO. 2:16-cv-02851-RFB-CWH

**[PROPOSED] ORDER FOR STIPULATED
PERMANENT INJUNCTION**

1 WHEREAS, on December 9, 2016, Plaintiffs Equalia LLC and Hoverboard Technologies
2 Corporation (collectively, "Equalia"), filed a civil action seeking relief for patent infringement
3 under 35 U.S.C. §271, and unfair and deceptive trade practices under 15 U.S.C. §45, entitled
4 *Equalia LL,C et al. v. Kushgo LLC, et al.*, in the United States District Court, District of Nevada,
5 Case No. 2:16-cv-2851-RFB (the "Nevada Litigation") against Defendants Kushgo LLC, Halo
6 Board LLC, and Arthur Andreasyan (collectively, "Defendants");

7 WHEREAS, on February 19, 2017, Defendants filed an appeal with the United States
8 Court of Appeals for the Federal Circuit, entitled *Equalia LL,C et al. v. Kushgo LLC, et al.*, Case
9 No. 17-1658 (the "Appellate Litigation");

10 WHEREAS, Equalia and Defendants (collectively, "Parties") have reached an agreement
11 ("Settlement Offer") to resolve the Nevada Action and the Appellate Litigation, and now wish to
12 stipulate to the entry of a Permanent Injunction;

13 NOW, THEREFORE, the Parties, by and through their counsel, hereby STIPULATE to
14 the entry of the following Permanent Injunction and request an Order for an injunction pursuant
15 to 35 U.S.C. §283 and Fed. R. Civ. P. 65, that Defendants Kushgo, LLC, Halo Board, LLC, and
16 Arthur Andreasyan, as well as their officers, agents, servants, employees, attorneys, and any other
17 persons in active concert or participation with them are PERMANENTLY ENJOINED from
18 marketing, displaying, making, using, offering to sell, or selling within the United States, or
19 importing into the United States, the accused "Halo Board" product(s) and all other products any
20 substantially similar version thereof, online within the United States or in any physical location
21 within the United States.

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1 This permanent injunction is understood to be consistent with the Court's order of January
2 20, 2017 as entered in Case No. 16-CV-02851. Docket 50.

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4 **IT IS SO STIPULATED.**

5 Dated: March 15, 2017

ROPERS, MAJESKI, KOHN & BENTLEY

7
8 By: /s/ Lael D. Andara

9 LAEL D. ANDARA
10 MARIE E. SOBIESKI
11 TIM J. LEPORE
Attorneys for Plaintiff
EQUALIA, LLC and HOVERBOARD
TECHNOLOGIES CORPORATION

12 Dated: March 15, 2017


13 By: /s/ Steven Rinehart

14 STEVEN RINEHART
Attorney for Defendants
KUSHGO, LLC, HALO BOARD, LLC, and
15 ARTHUR ANDREASYAN

16
17
18 Based on the above stipulation, and for good cause shown,

19
20 **IT IS SO ORDERED.**

21 Dated: March 15, 2017

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23 By: 
24 RICHARD F. BOULWARE, II
United States District Judge

25 DATED this 22nd day of March, 2017.

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City

CERTIFICATE OF SERVICE

In accordance with Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify that on the 13th day of March 2017, a copy of **[PROPOSED] ORDER FOR STIPULATED PERMANENT INJUNCTION**, was served on all CM/ECF registered parties by filing and serving the same using the CM/ECF filing system.

/s/ Lael D. Andara

Lael D. Andara
An employee of Ropers Majeski Kohn
& Bentley, P.C.

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City

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